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PLEASE REPLY TO
NEW JERSEY OFFICE

February 3, 2011

VIA ECF

Hon. Stanley R. Chesler, U.S.D.J.
District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

RE: Renaissance Carpet and Tapestries, Inc. v. S&H Rugs, Inc. et al.
Civil Action No. 09-CV-00632 (SRC-MAS)

Dear Judge Chesler:

We represent Defendants S&H Rugs, Inc. and Ori Wilbush in the above-referenced matter. We have been served with Plaintiff's Motion to Preclude Expert Testimony. Due to my travel schedule, the parties have consented to adjourn this motion to March 7, 2011 and are awaiting confirmation from Judge Shipp. Mr. Meister, counsel for Plaintiff, advises us that he intends to move for summary judgment. We also intend to move for summary judgment.

We believe that a number of the issues implicated in these motions are related and will, therefore, be more efficient if heard together. Please provide the parties with a briefing schedule for these motions. I am happy to participate in a conference call to discuss a schedule, if the Court so wishes. Thank you for your attention to this matter.

Very truly yours,



Jay R. McDaniel

CC: Ronald Meister, Esq. (*via ECF and email*)
Ori Wilbush (*via email*)